Case 1:23-cv-08975-LDH-TAM

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VIA ECF

Gideon Orion Oliver

—ATTORNEY AT LAW— He/him/his

> Honorable Taryn A. Merkl United States Magistrate Judge United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

> > Korey Watson v. The City of New Yok et al., 23-CV-08975 (LDH)(TAM) Re:

Your Honor:

I am co-counsel for Plaintiff Korey Watson in the above-referenced matter.

I write on behalf of all counsel to make this joint application seeking a settlement conference and a stay of all discovery in the case until after the conference takes place. All parties agree that attempting to settle the case at this stage, rather than conducting further discovery (including depositions), now makes the most sense.

If the Court is amenable to this application, Mr. Watson, and counsel for all parties, are available on the following dates and times in May:

5/19 (in-person or virtual)

5/20 (virtual only)

5/22 (after 2pm) (in-person or virtual)

5/28 (after 1pm) (in-person or virtual)

5/30 (virtual only)

Of course, the parties would be happy to provide additional dates and times, after May, if necessary.

If the Court does not grant the present stay application, the parties will promptly make a joint application to extend the current deadlines in the case by 90 days, in light of the current status of discovery.

The parties thank Your Honor for you for the Court's attention to this matter.

Respectfully submitted,

/S/

Gideon Orion Oliver